

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 4:22-CR-00296 RWS
v.)	
)	
JEFFREY BOYD,)	
)	
Defendants.)	

MOTION TO CONSOLIDATE CASES

Comes now the United States of America by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri and Hal Goldsmith, Assistant United States Attorney for said District, and requests that the Court transfer this case to District Court Judge Clark in order to consolidate this case with Case Number 4:22-CR-297 SRC. The United States respectfully states, in support of its Motion, as follows:

1. Defendant, Jeffrey Boyd, is charged in both this case and in Case Number 4:22-CR-00297 SRC. The instant case involves allegations of wire fraud related to an auto insurance application made by defendant during 2021. Case Number 4:22-CR-00297 SRC involves a long-term public corruption investigation, from January, 2020 through March, 2022, for which defendant and two co-defendants have been charged with multiple bribery and public corruption charges.
2. The parties have entered into a consolidated plea agreement whereby the defendant has agreed to plead guilty to all charges contained in both the instant case and in Case Number 4:22-CR-00297 SRC. A Plea Hearing is scheduled for August 26, 2022 before District Judge Clark.

3. As counsel for the United States and counsel for defendant advised this Court during the Status Conference held on August 19, 2022, it is the desire of both parties to consolidate these two cases for purposes of entering into a consolidated plea agreement on August 26, 2022. It is the parties' understanding that both District Court Judges agree to the requested consolidation.

WHEREFORE, the United States respectfully requests that this Court transfer the instant case to District Court Judge Clark in order to consolidate this case with Case Number 4:22-CR-297 SRC.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Hal Goldsmith
HAL GOLDSMITH, #32984MO
Assistant United States Attorney
111 S. 10th Street, Room 20.331
St. Louis, Missouri 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2022, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Hal Goldsmith
HAL GOLDSMITH, #32984MO
Assistant United States Attorney